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July 13, 1988

VIA FEDERAL EXPRESS

Audrey Bimby, Esq.
Assistant Regional Counsel
U.S. Environmental Protection Agency
Region VII
726 Minnesota Avenue
Kansas City, Kansas 66101

Re: Sheller-Globe Corporation
Keokuk Division
RCRA VII-88-H-0016

JUL 14 1988
EPA-CNSL-CERCLA

Dear Ms. Bimby:

This is in response to your letter dated June 30, 1988, requesting additional information from Sheller-Globe Corporation in connection with the above-referenced matter.

Attached hereto is a topographical drawing depicting the natural earthen depression into which all of the process wastewater lines and most of the storm water at the Keokuk plant are drained. Under normal operating conditions, and in the absence of heavy rainfall, the basin area is typically filled to approximately the 616 foot elevation line. The approximate dimensions of the basin area are 8 feet x 12 feet x 2.5 feet deep. The estimated volume of the basin area is 2,000 gallons. Water from the basin area is channeled through approximately 90 feet of ditch (which has a volume of about 1000 gallons) and then into a 48" concrete pipe which discharges to the on site cooling pond.

You also have asked that Sheller-Globe provide the flow rate per hour of the waste stream from the mold cleaner vat. As you know, the mold cleaner vat is no longer discharged through the plant's waste water sewer system and at this time it is possible only to estimate the flow. The vat holds approximately 300 gallons when in use. Because the vat accumulates solids which



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will restrict flow during vat draining operations, Sheller-Globe estimates that the rate of discharge would be slower than discharge from the mold rinse tank, which is approximately the same size. Sheller-Globe estimates that the rate of discharge from the tank into the waste water system would be approximately 300 gallons per hour. Flow through the sewer system, which uses gravity flow, would be at a somewhat slower rate because of catch basins and sumps located through the approximately 1000 feet of piping before discharge into the basin area after mixture with all other discharges in that system. It is estimated that all of the vat discharge might take 3 to 4 hours before reaching the basin.

This information is submitted for the purpose of facilitating settlement discussions and negotiations in connection with the above-referenced matter and does not constitute an admission with regard to any matter by Sheller-Globe, as is true of all information that has been submitted by Sheller-Globe during the course of these negotiations.

We hope that this information will be helpful to you. Please call me if you have further questions. I will contact you next week to discuss the status of EPA's review and possible settlement. As we are obligated to provide a status report to the administrative law judge on July 22, we will appreciate an indication of EPA's position as soon as possible.

Sincerely yours,

Diana C. Dutton /sr

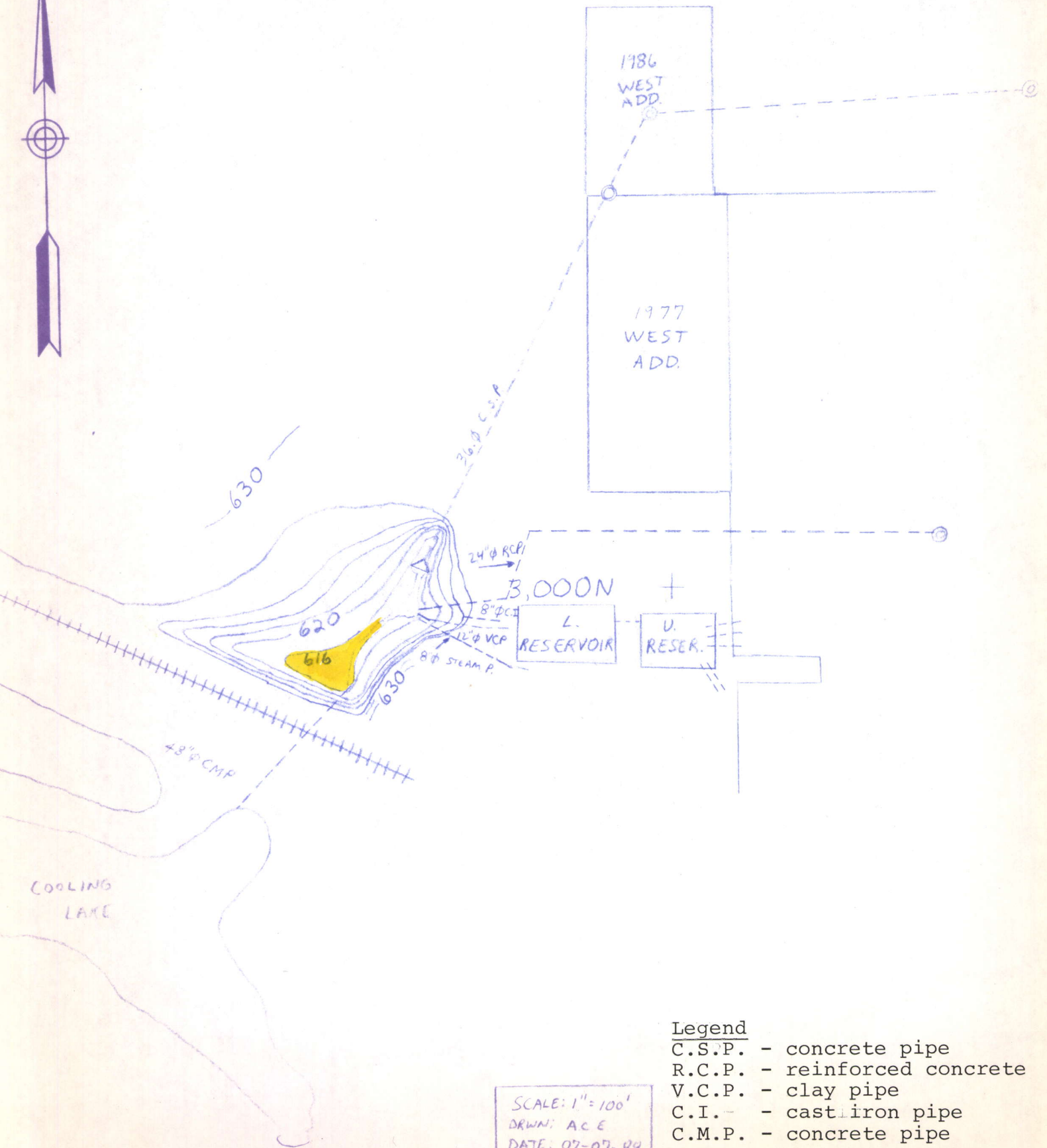
Diana C. Dutton

DCD/lmr

Enclosure

cc: Lawrence E. King, Esq.
Mr. Gregory Sautter
Mr. Andy Edgar

SHELLER-GLOBE CORPORATION
KEOKUK DIVISION
DISCHARGE BASIN TOPOGRAPHY
OVERLAY FOR DRAWING NUMBER 4798-1



Legend

C.S.P. - concrete pipe
R.C.P. - reinforced concrete
V.C.P. - clay pipe
C.I. - cast iron pipe
C.M.P. - concrete pipe

SCALE: 1" = 100'
DRWN: ACE
DATE: 07-07-88